

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

In re:
CHARLES L. HATCH
THERESA A. HATCH

Case No. 05-70650-SCS
Chapter 13

Debtor(s) .

SELECT PORTFOLIO SERVICING, INC.,

Plaintiff,

v.

CMN

CHARLES E. HATCH
THERESA A. HATCH,
FRANK J. SANTORO, Trustee,

Defendant(s) .

A N S W E R

COME NOW the debtors by counsel, and for their answer to the Motion For Relief from Stay filed herein, represents that they have no objection to the entry of the order.

1. The debtors' anticipate surrendering the real estate located at 301 Washington Street, Franklin, Virginia, back to Select Portfolio Servicing, Inc.

WHEREFORE, the counsel for the Debtors pray that the motion for relief requested by Kevin R. Hildebeidel, Esquire, counsel for Select Portfolio Servicing, Inc. be granted.

James L. Pedigo, Jr., Esquire (VSB #30796)
Counsel for Debtors
ALEXANDER P. SMITH AND ASSOCIATES, P.C.
Post Office Box 3368
Norfolk, Virginia 23514-3368
E-mail: jlpedigo@infionline.net
(757) 622-1621

**CHARLES E. HATCH
THERESA A. HATCH**

By /s/ James L. Pedigo, Jr.
Of Counsel

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing Answer was mailed/or electronically forward this 11th day of April, 2005 to Kevin R. Hildebeidel, Esquire, Counsel for Select Portfolio Servicing, Inc., 10412 Main Street, Second Floor, Fairfax, VA 22030; George W. Neal, Trustee, 870 Greenbrier Circle, Suite 402, Chesapeake, VA 23320, the debtors 301 Morton Street, Franklin, VA 23851.

/s/James L. Pedigo, Jr.
James L. Pedigo, Jr., Esquire

kid